

From: [Jan Keller](#)
To: [Bedwell, Heidi](#)
Subject: Energize Eastside permit applications (CUP File # 17-120556-LB and CALUP File # 17-120557-LO)
Date: Monday, October 22, 2018 10:18:51 AM

Dear Ms. Bedwell,

This is regarding PSE's Energize Eastside permit applications (CUP File # 17-120556-LB and CALUP File # 17-120557-LO).

I am writing to urge that the City of Bellevue NOT approve Puget Sound Energy's application to build Energize Eastside because:

- 1. PSE has simply not demonstrated the need for such a damaging project.** This is crucial. The permits should not be approved on this point alone, although I will provide more points below. PSE's record of poor-quality long-term forecasts, that repeatedly do not come to pass, forms no basis for PSE to then say that their current forecasts, using the same methodology, indicate some kind of urgent need. If there is any need, which in itself is questionable, it will only develop well into the future. I call the project "damaging" based on the number of big trees that would be cut. If such a large number of big trees is cut, it doesn't matter if small trees are planted, in a nearby spot or elsewhere—it still leaves us with gaping holes in our tree canopy. Here's a reference in the Final EIS: On page 1-5, it says, "Without adding transmission capacity for local peak periods in the Eastside, a deficiency could develop as early as winter of 2017-2018, with potential for load shedding (forced power outages) by summer of 2018." We had a hot summer this year, and there was no load shedding. Note that I would like to write here about PSE's data about peak periods, but PSE does not share that data. However, I do have access to data that demonstrates the same overall *trends* as peak periods do. That data is overall electricity usage shown at <https://k4c.scope5.com/pages/61> ("City of Bellevue Environmental Stewardship by the Numbers, Community Energy Usage"). The trend for the last seven years is essentially *flat*, and casts further doubt on PSE's claims about a rising demand for energy. With my statements above, and with careful review of how PSE has had to repeatedly revise its projections downward, it becomes clear that PSE is using poor analysis that consistently overstates future load. PSE truly has not demonstrated the need for the project.
- 2. PSE's EIS is markedly flawed because it does a poor job of examining alternatives to the project.** This stands alone, but it is even more important in light of point #1 above. That is, even given the lack of urgent need for the project, PSE somehow still seems uninterested in carefully examining alternatives. These means the EIS is flawed and incomplete, and should not be accepted as adequate for the permit application. For this and other reasons, the City of Bellevue should deny the permit.

We are in a situation where the need is not urgent and excellent alternatives are rapidly expanding. PSE has a deep responsibility to carefully study and monitor those alternatives so that, if somehow action is needed, it can quickly turn its attention toward those alternatives rather than a 230 kV line. The Energize Eastside

project is extreme, not appropriate or small in impact, and in the EIS, PSE does a poor job of studying alternatives and acknowledging that they are expanding month by month.

Here is some more detail. In the EIS documents, I tried to follow the discussion about Alternative 2 and related alternatives. I found this quite difficult, because the discussion was spread across at least four documents—all three phases of the EIS, plus the 2015 Strategen study—with one document pointing to another that pointed to yet another, rather than the Final EIS fully discussing alternatives. (This is not disqualifying, of course, but it is certainly not a plus either.) What isn't discussed in the documents, but comes out when you do the exercise of going from one document to another, is that PSE has not actually researched how a combination of technology alternatives, applied in an intelligent, logical way, can work together. PSE narrowly studied battery storage by itself in the Strategen study, but this does not represent the logical thing to study, which is the *combination* of batteries, electrical efficiency, distributed generation, demand response, and other technologies. The study also did not study batteries deployed in a logical way—distributed across multiple locations in the system. Essentially, the EIS dismissed alternatives related to Alternative 2 by pointing at an inadequate study that looked at batteries alone, deployed in an illogical way.

To make my comment clear, here are some specific page numbers. The Final EIS says on Page J1-24: "However, Alternative 2 was not carried forward in the Phase 2 Draft EIS, for reasons described in Section 2.2 of that document; therefore, variations on Alternative 2 were not analyzed." Going back to the Phase 2 draft EIS, I see (page 2-56), "PSE found that transmission-level battery storage technology was not sufficiently developed at this time to address the full need for the Eastside (Strategen, 2015), although it could be a partial solution." This is a point in the EIS at which the discussion of alternatives truly breaks down. It says that battery storage "could be a partial solution," but PSE did not study it as such, in combination with other solutions—which leaves a large gap in the EIS. Instead, PSE chose arbitrary, illogical limits to place around the alternative that it studied, then used the results of that limited, illogical study to claim that all related alternatives would wouldn't work. The result is a flawed EIS.

This flaw is especially serious because the wealth of alternative approaches that were left out are relatively low-cost and very low-impact. PSE may have decided to study batteries in an overly narrow, illogical way (during or after the EIS), but that is no reason to dismiss logical, low-cost, low-impact alternatives that are becoming more effective and flexible every month.

3. **PSE's EIS is markedly flawed because it does a poor job of taking significant portions of the public comment on earlier drafts seriously.** It is not enough to publish Phase 2 and later phases of an EIS with sections in them that summarize or list public comment, while not actually taking that comment seriously. Why hold public comment sessions if large portions of the comments will simply disappear into an appendix? I will not try to cover all the ways that this is true. I will simply point to the fact that the public clearly asked PSE, early on, to truly remedy the flaw discussed in item #2 above. PSE had a chance to remedy that flaw, and did a very poor job, with the Strategen study in 2015. That study looked very narrowly at the rapidly expanding

collection of alternatives that together provide a constantly increasing number of ways to respond to the possibility that peak load challenges *might* arise. PSE can choose to structure its documents as if such flaws aren't there in the EIS, and weren't called out by the public. But the City of Bellevue should hold the EIS to a reasonable standard of quality, recognize such flaws, and reject the EIS and permit.

4. **PSE has not demonstrated sufficient concern about the severe environmental impacts (especially impacts to the tree canopy) described in the EIS.** This is apparent in the poor quality of the examination of alternatives. PSE matter-of-factly describes the loss of thousands of valuable urban trees as if this loss does not require them to look extremely carefully for better alternatives. This is happening at a time when the City of Bellevue is working hard to find ways to increase our tree canopy by even a few percent. (Needless to say, cutting a large established tree and replacing it with smaller trees—which will struggle as our summers get hotter and drier—does not really help our tree canopy.) Applying for a permit should be equivalent to saying "We understand what the City of Bellevue wants to become in the future, and this proposed action will move Bellevue in that direction." With the Energize Eastside EIS and permit applications, PSE is clearly not saying this. PSE is instead demonstrating that it does not place a high value on Bellevue's urban trees, and does not understand the direction that Bellevue wants to move--toward greater tree canopy, not less.
5. **PSE has not demonstrated sufficient concern about affordability in Bellevue, by submitting an EIS that leaves out the most cost-effective ways to improve reliability in our grid.** More than 90% of the outages experienced by Eastside customers are caused by storms and equipment failure. Smart grid technology can reduce the number and duration of these outages very cost-effectively (while also preserving trees). PSE appears to think that it is acceptable to ignore this, and invest a large amount of ratepayer funds in an expensive 230 kV line. They should instead be investing those funds in cost-effective improvements using self-healing grids, demand response, electrical efficiency, and other technologies that are highly resilient in the face of disruptions such as storms.
Similar to point 4 (above), applying for a permit should be equivalent to saying "We understand what the City of Bellevue wants for its citizens, and this proposed action will move Bellevue in that direction." PSE's EIS and permit application say the opposite: they show little concern about the City of Bellevue's interest in affordability for residents.

For all the reasons above, I urge the City of Bellevue NOT to approve Puget Sound Energy's application to build Energize Eastside.

Thank you for the opportunity to comment.

Sincerely,
Jennifer Keller

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